

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FOSSA LTD., ICELANDICPLUS, LLC, and STEVEN BARLOW,)	
)	
Plaintiffs/Counterclaim Defendants,)	
)	
v.)	
)	
I JIAN LIN and ENCOMPASS COMMUNICATIONS, INC.,)	
)	
Defendants/Counterclaim Plaintiffs,)	C.A. No. 1:16-cv-11914-LTS
)	
v.)	
)	
VALENTIN DAVID GURVITZ, ESQ., BOSTON LAW GROUP, P.C., and SONYA LIVSHITS,)	
)	
Counterclaim Defendants.)	
)	

**SECOND ASSENTED-TO MOTION FOR BRIEF EXTENSION OF TIME
FOR PLAINTIFFS TO FILE AN AMENDED COMPLAINT**

Plaintiffs/Counterclaim Defendants Fossa Ltd., IcelandicPLUS, LLC, and Steven Barlow, with the assent of Defendants/Counterclaim Plaintiffs I Jian Lin and Encompass Communications, Inc. and Counterclaim Defendants Valentin Gurvits, Boston Law Group, P.C., and Sonya Livshits, respectfully request that this Honorable Court extend the deadline for: (a) Plaintiffs to file an Amended Complaint, which shall not include any causes of action under the Racketeer Influenced and Corrupt Organizations Act, until and including Tuesday, November 28, 2017; and (b) Defendants to file an Answer to Plaintiffs' Amended Complaint and an Amended Counterclaim until and including December 29, 2017.

As grounds for this motion, Plaintiff's state that:

1. Despite his best efforts, Plaintiffs' counsel requires an additional two (2) days to file an Amended Complaint.
2. All other parties in this matter have assented to Plaintiffs' motion.
3. Allowing Plaintiffs' motion will not result in prejudice to any party or cause undue delay, and is in the interest of judicial economy.
4. This will be Plaintiffs' final request for an extension of this deadline.

Respectfully submitted,

/s/ Thomas M. Ciampa
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IcelandicPLUS, LLC, and Sonya Livshits*

ASSENTED TO:

/s/ Daniel J. Murphy
Daniel J. Murphy
*Counsel for I Jian Lin and
Encompass Communications, Inc.*

ASSENTED TO:

/s/ Evan Fray-Witzer
Evan Fray-Witzer
*Counsel for Valentin Gurvits,
Boston Law Group, P.C.*

Dated: November 27, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 27, 2017.

/s/ Thomas M. Ciampa